

Comments from Regional Water Quality Meetings, October, 2003

Cedar Rapids, Oct 7, 2003; Attendance 55.

- Whose Impaired Waters List is it, anyway? If local groups identify problem watersheds impacting their waters, shouldn't they count as a priority for funding just as the 'official impaired waters list' does?
- Perhaps we need to establish something like the Conservancy Districts that were abandoned in the 1980's to allow some formal, legal entity for planning, coordination and implementation on a watershed basis.
- If a city has an impaired water near it, and it has monitored and can identify no sources within it that are associated with the problem (arsenic, Bettendorf and Davenport), what can it do so it is not required to do Phase II storm water activities? They are not getting much help from DNR. (Comment: Bettendorf and Davenport are required to do Phase II because of the size of the community, not because of the impaired water designation of the Mississippi River. There is an issue here, though, as the drinking water standard (which is set considering costs) is higher than the drinking water source level of concern (which is not set with any cost factor associated with it) and is the cause of listing the waterbody as impaired.)
- Funding for natural resources is shockingly low. National Heritage Foundation supports the \$0.02 goal for funding natural resources.
- More resources are needed for the natural resources. SWCD indicated that there are simply not enough funds available to pay for projects and activities for which there are willing landowners and groups.
- Government should not subsidize crop insurance through the commodity program. An organic farmer expressed concern for conventional row crops which leave fields bare from harvest to June 1 and subject to erosion and nutrient losses.
- Concerned with the nutrient budget. He (a farmer) is trying to do a good job managing nutrients. Wanted to make sure that Extension and other groups have input into developing the nutrient budget. Suggest that we cost share to support GPS and variable rate application/harvesting to help farmers gain a personal record of their nutrients and yields. Wants voluntary compliance based on self interest and efficiency. Like the soybean association program of working with farmers to help them assess their nutrient programs and assess efficiency.
- If you set water quality standards, it will run us out of business.
- I hear that DNR is not doing any more TMDLs. How many have you done? This year? You are working really slowly and not enough is being done. Also, what is the status of the 2002 impaired waters list.
- Soil Commissioner suggested that Iowa fund \$0.05 tax on each drink container for water quality. Said that it will be discussed by soil commissioners because they realize that Iowa needs money for resources, and people who buy drink containers are folks who can voluntarily pay more taxes (I presume because they are already paying a high price for a drink.)
- Would like to see a standard set for nutrients. Farmer favors variable rate application. Also, the nutrient management plan (required by NRCS for cost share participation) is too lengthy. It needs to be shorter to be used and effective.

- GPS is a good technology for nutrient management.
- No till is a good way to protect water because it cuts down the phosphorus problem with soil conservation.
- Get all the farm groups together and have them decide how to get this done. What could we achieve if they put their minds to it!?

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Calmar, Oct 8, 2003; Attendance 30.

- Treat water quality; don't manipulate the Impaired Waters List process by changing standards or minimizing monitoring to get waters off the Impaired Waters List just to show 'apparent progress.'
- It is not acceptable to charge the public \$25 for the Governor's Summit. The Governor needs the input of normal citizens and they should not charge anything.
- Treat septic systems. Improve the permitting of municipal treatment facilities so we don't have problems. Improve the NPDES permit system so we don't have problems. We need standards for sediment and nutrients. Need control on tile drainage systems. How can we have fences across a navigable waterway?
- There was concern expressed about allowing release of the municipally owned industrial sewage lagoon into a dry creek tributary of the Yellow River.
- We need to be concerned with groundwater, not just surface water.
- The Governor's goal of eliminating all impaired waterways by 2010 is simply unrealistic. We need to be realistic. It takes time for aquatic systems to respond when we do take action. It took years to get this way and it will take years to improve our waters.
- Concerned with the technical merit of the nutrient budget. Also concerned that DNR's scarce resources are being spent on the nutrient budget (of dubious merit) when the resources should all be going into solving the problem.
- We need nutrient water quality standards.
- It is a problem to get Iowan's to learn about water quality. How does the state get the message out?
- We need more water sampling; we need to keep cattle out of our streams; we need to divert water around open feed lots.
- IOWATER is a good program. It is educating people and gaining information about the problems. It can develop leadership in watersheds.
- Why aren't there any legislators here?

Ankeny, October 14, 2003; Attendance: 75.

- Urbanization is an important natural resource issue. It is consuming a county-sized area each decade. It promotes runoff with concrete, asphalt, and land disturbance that degrade water quality and cause storm water problems. We need better ordinances for sediment control and to promote infiltration. Need technical assistance to provide educational programs. 40 runoff plans are needed. Need to support urban runoff positions for IDALS. (Irv Klass, Story Co Conservation Board?)
- Need to promote and encourage SRF for point and non-point sources. We have money here. Why does Iowa use one level of fish consumption standards that is

- different from other states. ? CAFOs (concentrated animal feeding operations) are point sources and need NPDES limits. DNR needs to develop standards and monitoring for wetlands. Summit needs to develop specific implementation steps and timetables...unlike the Watershed Report. (Erin Jordahl, Sierra Club)
- How does P get to lakes and how long does it stay? Is most P coming from ag? (Comes with erosion/runoff; stays a long time)
 - If 80% of the inputs can be stopped by controlling 5% and if \$16,000,000 would return so much to Clear Lake, couldn't we target high impact areas all around the state and get a lot done? How much would it cost to target areas all across the state. Would it be cost-effective?
 - Would all waters be impaired if we had nutrient standards? (Yes and no. The waters would be impaired, but only officially if there is monitoring, thus monitoring limits the number of waterbodies.)
 - If agriculture is the major problem, we need to get farmers together to find solutions. We need the major stakeholders to play a role in finding the solutions. (Farmer)
 - Do rivers get better below the red (impaired) segments? (No, it is based on having monitoring.)
 - The federal government seems to have the checkbook to change our landscape. Couldn't we target the money at problems and pay farmers for solutions? What would that cost?
 - Urbanization needs to consider impacts on water quality. Funding for activities should be based on impacts to water quality, i.e. tie transportation dollars on roads to appropriate water quality especially where expansion is taking place as in West Des Moines.
 - Watershed groups can work. From experience they work best when one agricultural impact or example is always matched with one urban impact...thus all parts of our population play important roles in solutions. Need to break down urban/ag and political barriers to work on a watershed basis.
 - Educational efforts need better presentation.
 - Iowa needs some sort of watershed organizations...we need to organize on watershed basis.
 - Tax bad practices. Provide incentives for good practices and disincentives for bad. Treat problems on a watershed basis; not targeted areas.
 - We need watershed management to solve problems.
 - The Conservation Reserve Program is one of the most effective practices. We need more programs working between federal and state levels. Target CRP to the problems, not whole farms. Go sell it at high impact locations. Market it. Sell it actively.
 - Is N from farms the same as in urban areas?
 - Awareness is needed in the Iowa populace. Develop a campaign. Show it on TV. Show people what it is like (i.e., murky all the time on the Des Moines River south of Des Moines) and what it could be like. Only way to change it is to get the information out to the public.

- Water is our most important asset for economic development. Currently we are driving our children and business away by our environmental policies and practices (air and water?). We need to develop extensive buffers along our rivers and make them beautiful and protective of erosion/nutrient sinks. Promote greenbelts. Encourage lots of activities. Water is a common element to high value recreation which our state needs for economic development. Goal: clean water most of the time.
- Our policies on septic systems is not consistent with clean water goals. Subdivisions need long term sewage infrastructure; some are currently not allowed to hook up to a centralized system. Private sewage systems must function properly, not be hooked into tile lines or direct discharge to waterways. We should not tolerate this cultural acceptance.
- DNR needs to work with cities more in their development policies. We should not allow topsoil to be stripped. This requires more inputs to lawns and inhibits good water infiltration. DNR needs to take a more active role in development areas, i.e., Ankeny where it's illegal to use plants that use less water.
- Get word out. We need better education on water quality. Couldn't we use public access TV to get the word out better? Or a statewide curriculum?

Centerville, October 16, 2003; Attendance: 30.

- The model of the Rathbun Watershed Alliance needs to be promoted to all areas of the state. People are engaged because they are working together and have a common stake in the problems of water quality. Watershed approaches work. Funding to enhance their activities needs to be promoted.
- Shoreline erosion is the biggest problem at Rathbun. The cost of managing erosion should be a part of the regular operating costs of the lake.
- Big gullies are a major part of the sediment problem in Rathbun. It isn't private land sheet erosion, and it isn't lakeshore erosion. What is being done on these public lands with gullies? Shouldn't those be taken care of first before we point fingers at land owners?
- Fish and other aquatic organisms aren't that important. If we can use the water, it is ok. Why should it cost us anything to protect or restore them?
- Current farm programs often reward those who are doing a bad job, thus bad guys win! Farmers should be rewarded for doing a good job in farm programs.
- We need to establish water quality standards
- The Governor's goal is impossible. With the resources Iowa has, all resources should be placed into 6-7 watershed projects for use as demonstration of what can be done. This would encourage more action by proving results with limited resources.
- Focus TMDL implementation of a few water bodies (and watersheds) to demonstrate results.
- There should be a tax on lawn fertilizer that goes into funding programs.
- There is important research on perennializing annual crops. These should be funded and promoted. Research in general needs to be supported.

- Composting toilets are available now. They work. They should be employed rather than trying to use expensive septic systems that don't work in southern Iowa very well.
- Need to look at total cost of confinements, including social, economic and environmental impacts. We need to look at the quality of our fish resources as an indicator of the health of our whole ecosystem.
- There are seasonal cabins on the river. They need sewage treatment.
- There is a product, Arobajet, that works in lagoons to reduce smell. Why isn't it promoted?
- Rathbun has made progress with reducing atrazine levels. The farmers in the watershed should be applauded.
- Taxes such as the property tax could be used as a strong incentive to promote better water protection practices. We need to find incentives for this.
- Urban and rural interests have often been looked at as being antagonistic in regards to water quality. But it has not occurred at Rathbun. Both need to take responsibility for their contributions to the problem and the solutions. City and county both need to be involved in watershed work.
- Water quality is a long, sustained journey. It is not something one does as a project and then is done.
- There are septic problems with our communities and especially at Sundown Lake.

Creston, October 21, 2003; Attendance: 31.

- There is a need to develop more TMDL plans promptly and improve more waters.
- Questions:
 - Has EPA lowered standards under the Bush administration? (Answer: no.)
 - Why won't the state let us have local control of our confined feed operations?
 - Can't we use science and data from other states?
 - Why don't we know why mussels are becoming extinct?
 - Are we using other data sets other than the state data for understanding our problems?
- There is a need to increase citizen awareness about water quality. How can we accomplish that? The issue is very important for Iowa's future growth. Our regulators are in denial. Our legislators don't care. We need a change of attitude in our legislature.
- Why don't we control manure better? Manure is spread on frozen ground and folks can continue to apply that way because it is only a recommendation, not a law.
- Would courts accept IOWATER data? (Answer: We don't know as it has never been tested in court, but it does not presently meet our credible data law.)
- Concern was expressed for the nutrient budget based on only 3 years of data. It should not be used to develop regulations as it is not authoritative data.

- We need to target our resources. Get the biggest bang for our buck by finding the source areas that are worst and concentrating our resources at fixing those land areas. Focus educational efforts on BMPs in those areas.
- We need better science on nutrients and sediment. Need better cause and effect relationships from research. We need better models to predict where problems are and how to solve them.
- We need to be very cautious with using the nutrient budget.
- Farmers are willing to implement practices, but it takes money. Incentives must be there.
- There are farmers standing in line to implement conservation measures, but the resources are not there. The resources need to be there for willing farmers. We need more resources.
- EQIP should not assist only those who are out of compliance to get into compliance. It encourages bad practices. We need to support those farmers who are doing things right.
- Hypoxia existed before 1950 and before fertilizers. We need to do more best management practices but we cannot make utopia. If 10% of the resources can take care of 90% of the problem, we should focus there, not on putting 90% of the resources towards fixing the last 10% of the problem.
- How are monitoring sites picked? (Answer: Optimize data for cost; get coverage of the state.)
- Thank you for making an effort to talk with our local people about water quality. Everyone here is here because we want to improve water quality.
- Private domestic waste is a problem in So. Iowa with our tight soils. We need better technology, better technical assistance, and more enforcement. (Or do we need nothing because there are so few people down here?...it is a bit unclear what was being said.) We need local input into our regulations.
- The goal of having no impaired waters by 2010 is bad. What we need is continual improvement and strategies for long term success.

Mason City, October 22, 2003; Attendance: 50-55.

- We need continuing education to remind people what they need to do and how to do things, and remind them of their personal responsibility to protect water in their everyday activities.
- We need more buffer strips.
- From a farmer: We need better timing of N applications, with regulation and enforcement. We also need much less tillage. The Conservation Security Program provides a carrot for farmers to do what they should be doing. We need that economic carrot.
- There is a need to classify wetlands and lakes appropriately and set rules appropriately so if we build a wetland to protect our waters, it does not then become another waterbody on the Impaired Waters List. Similarly with wetlands converted to lakes, it should not be held to 'lake' standards.
- Iowa needs to do more to get TMDL studies done. If we don't, the EPA will. We need more resources to do these studies.

- How many water bodies would be on the list if we had Nutrient Standards? (Answer: many more, perhaps 1000, depending on the standard and monitoring.)
- If we eliminated all 25% of fertilizer inputs, would it reduce the total moving into the water to 4% instead of 5%? (Answer: We wouldn't go there because there are many factors to reducing N in waters, but the logic suggests that conclusion based solely on the nutrient budget.)
- We need some sort of cost-share program to assist municipalities to install nutrient and sediment control structures and technology. (Comment: State Revolving Fund provides loans that might be applied to such projects, but no cost share exists presently.)
- Could watersheds be assigned a 'quota' for nutrient releases and then the local communities and folks would be held responsible for meeting that however they chose? It would promote local citizen involvement like Clear Lake or the Maquoketa Watershed projects. These projects are successful because they involve professionals providing technical information and alternatives and local people evaluating these alternatives, setting goals and leading implementation.
- Don't reinvent the wheel. Use research and ideas from other states.
- Concern was expressed for cumulative and synergistic effects of multiple pesticides in our waters. While each product might be 'safe', what is their cumulative effect?
- IOWATER program needs to be recognized and results used or volunteers will stop participating. (Followed by discussion of credible data law, motivation of individuals and the program, and appropriate use of IOWATER data by the DNR. Also a discussion of possible development of a hybrid system of monitoring by the state including citizen data collection w/ laboratory analysis.)
- Discussion of the need to continue to allow urban areas to enforce ordinances for things like phosphate-free fertilizers for lawn care. Urban uses of fertilizers should be kept free from agricultural rules and laws.

Sioux City, October 23, 2003; Attendance: 35.

- Can Iowa adopt its own nutrient standards? (Yes, it must or EPA will; standards can include economics, ability to achieve.) What are the negative impacts of P in water? (Answered in talk.)
- Jim Redman (Sierra Club): We don't pay enough to protect our resources. DNR needs to speak up and be a leader in these efforts. Western Iowa often feels left out and underappreciated. Its natural resources deserve more attention by the state.
- How do you define swimmable, fishable and drinkable? (By use or potential use; in standards; through rule making process.)
- Federal farm programs are the key as they impact so many farmer decisions. Federal, state and local groups need to be coordinated and work together. (A watershed coordinator with IDALS said there is good cooperation.)
- What is the status of the report on the impacts of lawn fertilizer and urban P? (Answer: It is being developed, but it depended, in part, on the nutrient budget that was done first.)
- We need to use federal programs for more filter strips and wetlands.

- We need restrictions on urban P applications and special products for urban lawn care without P. Urban folks should not be allowed to add P without having soil testing first. Applicators of urban lawns need restrictions on P applications: one size does not meet all needs and they need to put on fertilizers to meet environmental as well as lawn needs.
- Filter strips are a label requirement of many pesticides but are ignored. This should be enforced. (Comment: I am unsure of this is correct; there may be label restrictions with regard to some X feet of a waterway, but I'm not sure that the label requires development of a buffer strip, only a non-application zone.)
- In Western Iowa habitat alteration is a major contributor to 'impaired waters.'
- Point sources have been largely taken care of, but we need to keep livestock out of ponds and streams.
- We need DNR fingerprinting techniques to identify real sources of bacteria.
- Keeping sediment out of our waters is the most important thing to control. We need to find ways to encourage erosion protection plans.
- Urban construction is a big source of P and sediment. We need to do something. We also need construction standards to promote infiltration and retention of stormwater runoff.
- Water protection will take real financial resources however we decide to protect them. Environment First needs to be protected. Why are environmental programs the first to be cut? We need a strong voice for the environment.
- Local people need to keep pressure on legislators.
- We have high P, but was it always there? (No. Less erosion, less entrenched streams banks, less runoff).
- Clear Lake P is mostly urban.
- All watershed work is local. Locals know their watershed and their farming systems. Local people should drive the program goals. But we need state and federal involvement. We need to focus on continuous improvement and having rural and urban interests working together.
- Clean water in lakes is worth big money. Good water is good for the economy.
- Livestock producer: there is an agenda out there by some groups who have their own goals and will distort things to meet their goals. Groups are using air and water to meet their goals: stop the livestock industry.
- Farmers, especially farmers with herds, are doing a lot better now than 10 or 20 years ago.
- Give awards locally for people doing a good job.
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Estherville, October 30, 2003; Attendance: 45

- Is there any way people could be forced to keep filter strips? We need the authority to force protection of water resources.
- Minnesota locally in Jackson Co. is replacing many drain inlets with 'french drains' to reduce P in outlet waters.
- Around the Iowa Great Lakes, we need the authority to pass ordinances about P in fertilizer. Currently we cannot have that because of the fertilizer laws of the state.

Some of the alternatives would even give another product outlet for soybean products.

- Programs need to recognize that we need P protection. Most seem to want to force N protection. We need P protective practices and not all practices need to address N.
- The watershed approach is the best as it is local and involves people who know the problems and the people.
- Research should be done to develop perennial corn to replace annual corn.
- The enemy is us...it is all of us and what we do.
- We currently have drainage district law to promote drainage; we need drainage district type laws to promote wetlands.
- Conservancy districts sunsetted in the 1970's. Watersheds are the natural organizing unit for water protection. Drainage districts could be altered to form watershed districts.
- Water protection areas require funds. Perhaps these could be taxing units. Or alternate arrangements such as 28E agreements can be signed among cooperating governmental units (such as towns, counties) to put monies into watershed protection projects or areas. Such funds can be used to acquire grants. Great Lakes have a 12:1 success rate for acquiring outside monies with local monies.
- Urban development requires much more adoption of low environmental impact technologies, such as permeable paving and stormwater retention basins.
- The Conservation Security Program in the '02 Farm Bill is a good way to go. It would reward farmers for good practices including the ones they are already doing! It rewards the good conservation farmer and reinforces his practices while encouraging other farmers to adopt them. And it provides annual financial support that is necessary with today's economy. But USDA has not written rules for it and no funds have been authorized for it.
- There is a need for more financial resources for soil and water conservation from the state and federal governments.
- Natural resources are a significant factor to economic development.
- Various types of lakes and wetlands and streams need different types of numeric nutrient standards. One size does not fit all.
- Iowa should use carp as fertilizer.
- We need a moratorium on hog confinements and a study on their environmental impacts.
- Biotech industry expansion will not reduce nutrients in our waters.
- We need a way to encourage alternative crops to reduce reliance on corn and beans.
- Water quality is an issue for all farmers. But it is also for all urban people. We need to expand our use of State Revolving Funds for a wide variety of water quality projects, not just urban ones.
- We need an educational curriculum to teach our children pride in Iowa's landscape, and the need for clean water throughout K-12.

- Is there significance to fall application of anhydrous ammonia? (Dr. Jim Baker from ISU was present and briefly addressed this. This is being researched at the ISU Gilmore City ADW site. The efficacy of fall anhydrous application is very weather dependent and it is hard to generalize. Jack Riessen said that high nitrate levels in rivers during the late fall/winter months recently may be the result of fall application of anhydrous in years with relatively warm weather and wet conditions.)
- There should be incentives in the federal farm program for buffers to be installed around intake drains and agricultural drainage wells. They have been discussed and proposed by counties, but they have not been approved. (Another participant commented that such practices have been approved, suggesting that they may be consistency issues with program implementation.)
- The N removed from drinking water supplies should be sold to farmers for fertilizer rather than put back into the water downstream.
- Drainage districts have taxing authority and might have a role to play in water quality protection.
- Do you expect regulation of farming from the Summit? (To date, the regional water quality meetings have not shown strong support for regulation of nonpoint source pollution, which includes farming.)
- What is the basis of the nitrate standard in drinking water? (Methemoglobinemia in infants.)
- Septic tanks are a serious problem and have not been addressed by DNR or anyone. We need to get this under control before we worry about other things such as waste from hogs.
- Geese are a big problem in some county parks.
- Clean water alliances are the best solution to the water quality problems. Local people can get enthusiastic about clean up, at least around lakes. Need to fund local groups and initiatives like Lakeside Laboratory, volunteer groups, school kids who sample waters.
- Golf courses are a big problem with high rates of fertilization and pesticides.
- Goals proposed by EPA for N and P are unattainable with current land use. We need to set standards that are reasonable.

The following comments came through the Website (water.summit@dnr.state.ia.us) or through the mail service.

10/9/03

I'd like the state to also look at stormwater run-off as part of the water quality issue.

Pam Jochum

State Rep.

Dubuque

October 13, 2003

Dear Bernard,

We represent ROW (Restore Our Wapsipinicon) River. We are a grassroots organization in Frederika, Iowa on the banks of the Wapsipinicon River. We have the following suggestions to make to your committee regarding nitrogen runoff, bank erosion and siltation in our river:

1. Make it illegal to plant corn and soybeans next to a riverbank in Iowa.
2. Make certain all septic systems next to a riverbank are not antiquated and meet code. The state of Michigan enforces this. We should do likewise in Iowa.
3. Look at the whole watershed and find out where the siltation occurs in the river and have farmers do contour farming and plant buffer strips of prairie grasses.
4. Create a siltation pond and any silt would get caught in the pond.
5. Proceed to have the Army Corp of Engineers dredge the Upper Wapsipinicon River.

Having attended the Regional Water Quality Meeting on October 8, 2003 in Calmar, Iowa, we are convinced that a clean up of Iowa's rivers is necessary. Too many chemicals such as Atrazine, Metolachlor, Acetochlor, Desethyl Atrazine and Dimethenamid have infiltrated Iowa's waters. Several states have already banned or are taking action to ban these chemicals. Iowa needs to do likewise. According to the DNR, Round-Up is a safer chemical to use on crops and has been known to leave less residue in the environment.

The ideal solution would be to establish a system whereby large farms can be converted to small organic farms. The owner of the large farm would be bought out and have the option of continuing to farm a small (10-20 acre) parcel of his land organically with the rest divided amongst other farmers or put into prairie/wetland restoration. By reclaiming Iowa's farmland for healthy food production we can safeguard the soil and waterways.

Hopefully, the above comments have been helpful to you. We look forward to a favorable resolution of the upper Wapsipinicon River at the Governor's conference in Ames, Iowa.

Sincerely yours,

Thomas R. Karlowski, M.D.
Diana M. Karlowski, B.S. Biology
ROW Committee
Box 233
Frederika, IA 50631

October 14, 2003

Bernie Hoyer
Iowa Department of Natural Resources
Des Moines, IA 50319

Mr. Hoyer:

Thank you for this opportunity to participate in the planning for the Governor's state water quality summit. The Iowa Chapter of the Sierra Club, with over 5,000 members statewide, is very concerned about water quality in Iowa and is ready to play our role in protecting and cleaning up one of Iowa's most valuable resources.

Before I begin with comments about water quality in Iowa, I would like to remind other members of the public that the summit work group meetings are open to the public. So, if you are interested in attending those meetings as an observer, contact the Governor's office for a schedule.

I have some concerns about comments made during the DNR's presentation, which I would like to raise at this time.

Mr. Riesen stated that the funds used to build wastewater treatment plants in the past are no longer available, so that as upgrades and repairs are made to plants, the costs will have to be passed onto customers. I thought that the State Revolving Loan Fund (SRF) could be used for upgrades to wastewater treatment plants. I also thought that there have not been enough demands on this source of funding, so the DNR just went through a rulemaking process to look at other pollutant sources that could be eligible for the funds.

Mr. Riesen also stated that the reason Iowa doesn't have fish consumption advisories for mercury, even though surrounding states do, is because Iowa uses the FDA's level and other neighboring states use the EPA's level. How was this decision made in Iowa and why? And why was it decided that Iowa would not account for the safety of populations of Iowans who eat large quantities of fish that may be contaminated, as other states do?

Mr. Riesen stated that the state's NPDES program is a success. But how can Iowa's program be a success when no concentrated animal feeding operations have NPDES permits, even though the federal Clean Water Act clearly defines large CAFOs as point sources subject to permit control?

I am concerned that Iowa still does not have separate standards and a monitoring program for wetlands. Wetlands have been lumped in with lakes, which is an inadequate way of protecting wetland water quality. During the 1998 impaired waters listing process, the EPA told the state that we needed separate

wetlands standards, but nothing has been done since that time to develop such standards. When is this going to be done?

Finally, members of the Iowa Sierra Club want real solutions and an implementation plan to come out of the state water quality summit, solutions that we all can help implement to make improvements to Iowa's water quality. An extensive amount of time was put into creating the Iowa Watershed Task Force Report of 2001, but very few of the recommendations in that report have been implemented. We do not want the time, energy, and expertise that are going into the state water quality summit to be wasted because there is no implementation mechanism and timeline backing up the solutions generated.

Thank you again for the opportunity to participate in planning for the Governor's state water quality summit.

Erin E. Jordahl
Director, Iowa Chapter Sierra Club
3839 Merle Hay Road, Suite 280
Des Moines, IA 50310
515-277-8868
iowa.chapter@sierraclub.org
www.iowa.sierraclub.org

10/18/03

Dear Mr. Hoyer:

I very much enjoyed your presentation last week in Ames. Below, I've attached some ideas that I would like state leaders to consider in improving and protecting Iowa's waters. I've placed the ideas into two categories, according to geography: Rural Areas and Urbanizing Areas.

Rural Areas

1) Look for more opportunities to tie federal crop subsidies to the provision of water quality protection. For example, identify all farmland areas within x feet of important waterwaters -- i.e., "buffer areas." Consider permanent, voluntary protections for buffer strips i.e. watershed protection easements.

Pay willing sellers according to the lost profits (revenue minus expenses) from the net future cash flow stream associated with the yield from these buffer areas. Place the owner in a financially neutral to slightly positive position if they agree not to farm this acreage in perpetuity.

State or federal transportation dollars going to fund new roads and highways may also be a source of funding to help implement these types of programs (mitigation related).

2) Establish a limited number of science-based, controlled experiments (pilot programs) within the state that can begin to quantify the costs and benefits of various buffer protection strategies. Seek the input of farmers in setting up and running these experiments.

Run each experiment using one specific treatment strategy over an appropriate period of time, and most importantly, using an appropriate control area to measure impacts. Use the results of the experiments to identify the most successful strategies and weigh the appropriateness of extending these strategies to other areas.

Urban Areas

1) Minimizing the impacts of future flood events and protecting drinking water quality will be two of the biggest challenges for urbanizing areas. I would like to see the state play a larger role in ensuring that local communities are minimizing development activities within past, present, and future flood plains. Unfortunately, money and politics often sway local governing bodies from making good long-term planning decisions that are protective of the larger public interest.

One problem that we have today is that communities are building within floodplains that have not been delineated and "expanded" to accomodate future anticipated development within watersheds. For example, in West Des Moines, we are using a mid 1970s FEMA flood zone delineation that does not incorporate data from the 1993 flood, nor the impacts from subsequent flood control improvements, like downstream dikes, and their impacts on flood flow and lost flood storage.

One alternative might be to require communities like West Des Moines to have updated FEMA floodplain maps before signing off on any state permit requirements in flood plains areas. Ideally, the hydrologic modelling on which FEMA bases it floodzone delineations should incorporate future inputs, such as anticipated buildout as identified in the specific community's comprehensive plan, as well as upstream communities.

The state of Iowa might also consider looking at other state policies for limiting development activities within floodplains, particularly those which involve the placement of fill and the loss of flood storage. A "no net loss" of flood storage might be one goal worth pursuing.

The state might also consider withholding transportation or related funding for those communities which haven't met minimum standards for protecting flood zones and/or drinking water quality in urbanizing areas.

The state might also consider avenues to make funding available on a voluntary basis for those urbanizing communities which incorporate certain minimum water quality, flood control, and other protection policies into their land use planning (e.g. comprehensive plan, city ordinances, etc.)

Thank you for the opportunity to comment.

Sincerely,

John Norwood

1611 Green Branch Circle
West Des Moines, IA 50265
Tel (515) 277-2609
Fax (515) 440-1140

10/27/03

From William Jinkinson

Snow and Manure

A comment/challenge for the nonpoint pollution committee: Manure management requirements of the recent past have been very beneficial in causing livestock producers to think of manure as a valuable resource instead of a waste. Still, manure application on snow-covered ground remains a common occurrence that is justified, primarily, by the absence of soil compaction in winter. Nutrient runoff to surface waters w/ snow-melt is a likely consequence of this antiquated practice. We should strive to eliminate manure land application on snow-covered ground.

10/29/03

From Marsha Cory

Dear Sir/Madam:

I attended the recent regional water quality meeting held in Mason City. Thank-you to the DNR staff who organized the meeting as I thought it was very informational.

I couldn't help but notice how frequently lakes were mentioned as "being important to Iowa", "being related to the future of Iowa", "being important to the quality of life in the state and to economic development".

If the governor has placed on strong emphasis on water quality in the state, please make such that this emphasis is carried through to the state's budget. Lake restoration needs funding. Please make it a priority in the budgeting process.

Thank-you

Marsha Cory

10/31/03

To: Bernie Hoyer

From: Erwin E. Klaas, 1405 Grand, Ames, Iowa 50010

The attached statement was presented at the Regional Water Quality meeting in Ankeny on October 14, 2003. I would appreciate your including it in the official comments for this meeting. Thank you.

Statement at the Regional Water Quality Meeting, October 14, 2003, Ankeny Iowa by Erwin E. Klaas, Commissioner, Story Soil and Water Conservation District and Chair, Coordinating Committee, Urban Resources and Borderland Alliance Network.

Urbanization is changing the landscape of Iowa at a rapid rate. An Iowa State University land-use analysis, produced for the 1997-98 legislative land-use study commission, indicates that conversion of Iowa farmland to non-farm uses is at such a pace that 26,000 acres are converted each year—enough to absorb an entire county every decade. Most of this growth is occurring around our existing metropolitan areas.

Growth means more construction sites, more roads and highways and increased construction site erosion. Growth also means more concrete, roofs and impervious surfaces that lead to rapid water runoff, often polluted with our wastes. Increased runoff and erosion from construction sites carries sediment into streams, rivers and lakes. Increased runoff also causes bank erosion and other changes to the geomorphology of these water bodies.

Movement of sediment from construction sites can negatively affect neighboring land, storm sewers, and local water resources. The costs of clean-up (such as sediment removal, repairs, and restoration of resources affected by sediment), can be expensive or may even be impossible.

Planning for erosion and sediment control is the key. Good planning must be followed by sound design and good management practices. Proper maintenance of erosion and sediment control measures will insure construction site erosion and runoff does not degrade water quality.

The Soil and Water Districts in Dallas, Madison, Marion, Polk, Story and Warren counties joined together as partners several years ago to form the Urban Resources and Borderland Alliance Network or URBAN. We realized that we had an opportunity, **and a responsibility**, to improve our area's water quality.

With the assistance of a grant from the Watershed Protection Fund in the Dept. of Agriculture and Land Stewardship, we hired a capable urban conservationist to develop a program for education and technical assistance in the six county region. Through, workshops, training sessions, demonstrations, and one-on-one technical assistance, URBAN is promoting innovative storm water management practices, low impact development, erosion control and new design concepts. We are engaging developers, engineers, contractors, and others associated with construction to implement better sediment control measures. And, we are providing information on solutions to nonpoint source problems to city officials, information that they need to draft better ordinances to regulate construction sites..

We've managed to extend our work a few months beyond the initial two and a half years with grants and contracts from local agencies, but just when we are beginning to have a positive effect, our funding is drying up. We have accomplished a lot in the past two years but there is much to be done. Forty new cities in Iowa have recently submitted applications for nonpoint source discharge under Phase II of the Clean Water Act. They have been given an unfunded mandate to develop new stormwater management plans. Nearly all of these cities need assistance with education and information.

About three years ago, the Division of Soil Conservation, in their budget proposal to the legislature, requested a modest increase in funding to create urban conservationist positions in each of the state's major metropolitan areas. After the request was turned down two years in a row, the Department gave up. I suggest that they should keep trying and that Iowa citizens let their legislators know that this is a problem that won't go away. The need for urban conservation continues to grow. In the meantime, soil and water resources are being degraded and the effects will have major long lasting effects.

11/1/03

Dear Mr. Hoyer,

This letter is in regard to water quality. We have a creek $\frac{3}{4}$ miles long and we had a filter strip 30 ft wide on each side for 60+ years. We were going to make a wider filter on each side, but they would not pay for that which was already there. For being good stewards of the land we got nothing. Had we farmed up to the edge of the creek and let sediment and fertilizer and chemicals run in the creek we would have been paid. We were told if we farmed up to the creek for two years then it would qualify and could be put in with the rest of what we wanted to put in a filter strip.

We told our renter to break up to filter strip and farm it for 2 years, rent-free. We had intended to put in filter strip and make it much wider. Then the new program says 2 years isn't long and doesn't qualify. The people that farmed up to creek bank and left chemicals, fertilizer and topsoil run in for years they receive a nice check.

I'm not the only person out here that had this happen. I would like to know your feelings on this. Maybe you could ask some people about this at the meeting in Fort Dodge.

Ebbel Gerzema
1663 50th Street
Ackley, Iowa 50601

11/6/03

Dear Bernie:

I have one more thought to contribute to the Water Summit. On the subject of monitoring, I'm looking at the surface waterbody map that you handed out at the regional meetings, and wondering if the monitoring network is set up to determine contributions of organic and inorganic substances to the Mississippi and Missouri rivers on a watershed basis; that is, those originating from the state of Iowa?

The reason that I ask is that it might be helpful to be able to measure certain water quality and quantity parameters at the major watershed confluences with these rivers, starting with the largest river systems first. Along the Missouri, I see six or so major entry points, although area wise I see that most of the state drains to the east. Along the Mississippi, I see about seven or eight major confluences that cover a large percentage of the state's land mass.

If we measure the loading at the confluences with the two major river systems, we could begin to get a pretty good "big picture" snapshot of base conditions and changes in conditions by watershed over time, particularly those where we might be attempting to improve water quantity and quality characteristics through various land use treatment and/or farm bill strategies. Of course, upstream monitoring will need to be done on a finer basis to have the granularity necessary to measure pilot project results, but the downstream big picture monitoring will be key to measure the larger trends over time.

We might also designate and monitor some "control watersheds" where no treatment strategies are being implemented to help validate your results (smaller watershed areas with certain characteristics might be well suited for this task).

With a well designed monitoring system, we could start measuring the benefits of various management strategies yielding some returns on investment from point source, non-point source controls, urban and rural sources, etc.

Over time, it might be possible to start quantifying various positive downstream benefits including benefits resulting from reductions in sedimentation (avoided dredging costs/improved fishing benefits), reductions in peak storm flow (avoided flood control and flood costs), reduction in pollutant loading (avoided water treatment costs, improved property values, etc.).

It is my belief that we can demonstrate in no uncertain terms to the Federal Government that it pays to incentivize Iowa farmers to produce a reliable supply of clean water as well as food for the world!

Finally, it would also be helpful to measure Iowa and others state's performance on a relative basis toward clean water goals so that we know where and how to concentrate efforts, and which state's deserve gold star awards.

I'm probably preaching to the choir, but I thought I'd contribute the thoughts. Best of luck at the Summit.

Sincerely,

John Norwood

11/10/03

To the Department of Natural Resources:

Attention: Comments for Regional Water Quality Meeting.

My name is Jack Eastman. I am chair of the Leopold Group of the Iowa Chapter Sierra Club. The Leopold Group represents eight southeast Iowa counties.

I would like to mention a couple points concerning Iowa's water pollution problems. First of all, as easy as it is to blame farmers for our water

quality problems, the problem belongs to all of us. We all are responsible and we all need to take part in the solution. Runoff is a problem from both urban and rural sources. The farming system that we have is a major contributor of water degradation, but putting blame on farmers is a failure to recognize the complexities that make up the modern agricultural system--nor is it likely to accomplish anything.

In our town of 10,000, Fairfield, there is a small stream that begins in the town and runs down through our most favorite county park, Jefferson County Park. This stream drains a watershed consisting of many streets and parking lots, one of them the biggest in town, and has been tested by the DNR showing a higher than normal level of hydrocarbons. I would venture to guess that most cities in Iowa have a stream that is polluted from town sources, from runoff from streets, from the chemicals people put on their lawns, or, as is common, from inadequate municipal sewage treatment plants.

80% percent of the nitrogen pollution in our rivers and streams is a result of farm runoff, and Iowa is estimated to contribute 25% of the nutrients that are responsible for the Dead Zone in the Gulf of Mexico. For many of us the Hypoxic Zone in the Gulf of Mexico is too far away to have any sort of relevance to our lives in Iowa. But imagine this dead zone--an area the size of Connecticut, that is virtually devoid of life? And then imagine the impact that has on the local people whose livelihood depends on fishing. This is no small laughing matter.

We face some hard decisions. What are we going to do with the drain tile situation that exacerbates the nitrate loading of our streams and rivers? We can work with surface runoff by planting riparian buffer strips, but this solution does nothing for what goes under in a drainpipe. We need to find ways to reduce nutrients both before and after the pipe. Nitrogen applications, especially in the fall, may have to be regulated more closely. Some I've spoken to suggest that fall applications may have to be eliminated. Managed wetlands have been found to be helpful to reduce the amount of nutrients that reaches our streams and rivers. These could be implemented at the end of drain lines.

I agree with Governor Vilsack that plans need to be made now. I would like to see them include measures for implementation, so that when funds do again become available, we can act. I think it is important that our goals address both the short and the long term.

If we are going to ask the farmer to take some risks I believe there has to be compensation. The Conservation Security Act is the kind of program we can model our plans after in that it includes incentives for farmers to implement conservation management practices.

Governor Vilsack's goal to solve the water quality problems by 2010, and clear our name from the EPA impaired waters list, is laudable. It is no small task, but If we all share this goal there is no reason we can't be successful.

Thank you for giving me the opportunity to express my views.

Jack Eastman
Chair, Leopold Group, Sierra Club
PO Box 1192
Fairfield, IA 52556
641-469-5760

The following comment was provided to Bernard Hoyer at the Environmental Quality and Agriculture Conference, 11/10/03 in Des Moines, for inclusion in the Iowa Water Summit comments. The contributor attended the 11/5/03 meeting in Fort Dodge but did not voice this comment at the time.

The CRP rules allow for protection zones inside of a 2000 foot radius about a well for wellhead protection. They should be modified to include the entire capture zone of the sourcewater protection area.